

# EXHIBIT 3

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

**TALISHA VALDEZ, on behalf of herself  
and others similarly situated, and  
JENNIFER BLACKFORD on behalf of herself And  
others similarly situated,**

**Plaintiffs,**

**Civil Action No.**

**v.**

**MICHELLE LUJAN GRISHAM,  
Officially and Individually, Acting Under the Color of Law,  
and  
DAVID SCRASE,  
Officially and Individually, Acting Under the Color of Law,**

**Defendants.**

### DECLARATION OF TALISHA VALDEZ

I, Talisha Valdez declare:

1. I am a resident of Union County, New Mexico.
2. I am a parent to Raley Valdez who is 11 years old, and Riata Valdez who is 12 years old.
3. Each of my children are involved in 4H and have put considerable time and labor into the organization.
4. Raley and Riata have four pigs and 3 show lambs.
5. My family has dedicated \$9,000 in financial resources working toward showing these animals at the New Mexico State Fair.
6. Raley and Riata were anticipating showing their animals in the upcoming 2021 New Mexico State Fair.

7. I have not been vaccinated for COIVD-19 and neither has my daughter Riata.
8. I am Covid recovered having had covid in the proceeding 15 months.
9. The August 17, 2021, Public Health Order prohibits me and my children from attending the New Mexico State Fair and showing their animals.
10. We have paid entry fees associated with my children's animals being able to be shown at the New Mexico State Fair and have a contract.
11. I should not be required to be vaccinated in order to attend the New Mexico State Fair nor should I be required to vaccinate my child.
12. It is my right to choose not to be vaccinated for COVID-19 and it is my right as a parent to refuse to have my child injected with an experimental EUA vaccine.
13. I am familiar with the contents of the complaint in this matter and I verify that they are true and correct to the best of my knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and is executed this 18<sup>th</sup> day of August 2021, in Union County, New Mexico.



Talisha Valdez